IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA	**CASE NO. 3:15-CR-00148**
Plaintiff,	**JUDGE ROSE**
vs.	
CONNIE M. APOSTELOS	**MOTION TO TEMPORARILY MODIFIY CURFEW**
Defendant.	

Now comes the Defendant, **CONNIE M. APOSTELOS**, by and though her attorneys, **RION, RION & RION, L.P.A., INC.**, and hereby respectfully moves this Honorable Court for an Order modifying the conditions of her curfew at the time that her niece goes into labor, in the event that this would occur during the hours when she is restricted to her home. Her niece has an expected due date on or about March 27, 2017, however, given the unpredictability of nature, this date may vary.

The U.S. Attorney's office and Pre-Trial Service office have been contacted and do not oppose this request.

Respectfully submitted,

/s/ Jon Paul Rion

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Jpr/es

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a copy of the foregoing was sent to the office of the Prosecuting Attorney on the same day of filing.

//s// Jon Paul Rion

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JON PAUL RION
RION, RION & RION, L.P.A., INC.

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